

NS/TH:JPM  
F. #2019R01194

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

SHARIF LUCAS,

Defendant.

----- X

AFFIDAVIT IN SUPPORT  
OF AN APPLICATION FOR  
COMPLAINT & ARREST  
WARRANT

(18 U.S.C. § 922(g)(1))

22-MJ-  
22-mj-00633

EASTERN DISTRICT OF NEW YORK, SS:

MAX DOUGAL, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation (“FBI”), duly appointed according to law and acting as such.

Upon information and belief, on or about June 9, 2022, within the Eastern District of New York and elsewhere, the defendant SHARIF LUCAS, knowing that he had been previously convicted in a court of one or more crimes punishable by imprisonment for a term exceeding one year, did knowingly and intentionally possess in and affecting interstate or foreign commerce ammunition, to wit: Winchester, Winchester-Western, Federal and Hornady .380 caliber cartridge cases.

(Title 18, United States Code, Section 922(g)(1))

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

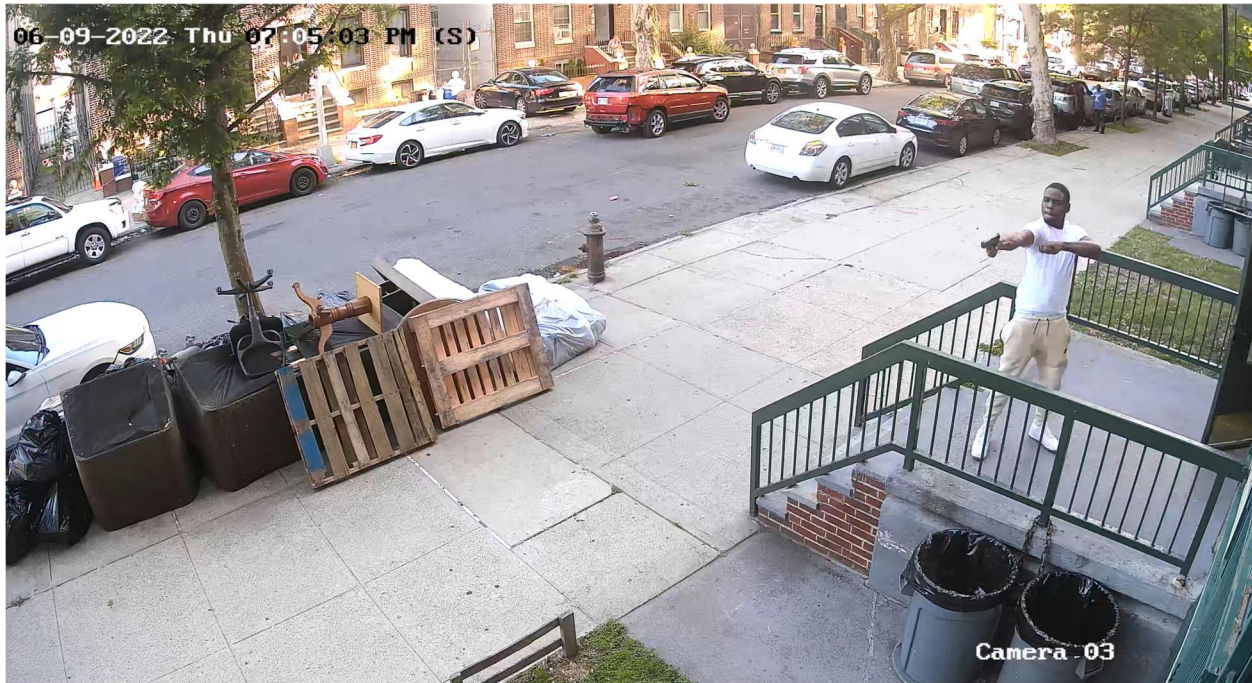
1. I have been a Special Agent with the FBI for approximately one and one-half years. I am responsible for conducting and assisting in investigations into the activities of individuals and criminal groups responsible for racketeering and other crimes associated with organized crime and, in particular, violent criminal gangs. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history and surveillance camera footage; and from reports of other law enforcement officers involved in the investigation. Where I describe statements of others, I am doing so only in sum and substance and in part.

2. Based on my review of police reports and video surveillance footage capturing the incident described herein, on or about June 9, 2022, at approximately 7:05 p.m., the defendant SHARIF LUCAS, wearing a white tee shirt, beige pants, and white shoes exited from the front door of a building on the 1600 block of Prospect Place in the Crown Heights neighborhood of Brooklyn, New York. Immediately upon leaving the front door, the defendant turned to his left and began firing multiple gunshots toward the east on

---

<sup>1</sup> Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

Prospect Place. A still image from video surveillance footage depicting the foregoing and the defendant firing the gunshots is below:



3. During the video surveillance footage that I have reviewed, spent cartridge cases (the portion of a round of ammunition that holds a bullet, primer and propellant) can be observed ejecting from the semi-automatic firearm used by the defendant SHARIF LUCAS. Based on my training and experience and involvement in gang investigations, as well as my training in handling and using firearms, I know that when a semi-automatic firearm is discharged, the cartridge case that had contained the bullet is expelled from the firearm's chamber and falls in the general area of where a gun was discharged. After firing multiple shots toward the east, the defendant turned to his right and began firing gunshots again (toward the west), including appearing to aim at two individuals near a parked car on the street, as depicted below in a snapshot from the surveillance video:



4. Based on the surveillance footage I have reviewed, after discharging additional gunshots, the defendant SHARIF LUCAS attempted to re-enter the building from which he had originally came but could not open the door, and then began to run toward the east on Prospect Place carrying the firearm.

5. Based on police reports and statements from other law enforcement officers, after the shooting, New York City Police Department officers responded to the shooting location on Prospect Place and located six cartridge cases from area where the shooting occurred. A subsequent analysis of the cartridge cases showed that they were manufactured by Winchester, Winchester-Western, Federal and Hornady. Based on information provided by an expert with the Bureau of Alcohol, Tobacco, Firearms and Explosives, each of these .380 caliber ammunitions was manufactured outside of the State of New York.

6. To identify the defendant SHARIF LUCAS as the person who discharged the firearm and ammunition as seen on surveillance video, I have reviewed known law enforcement photographs of LUCAS and compared those photographs to the surveillance video. I believe them to be the same person. In addition, I have spoken with a United States Probation Officer who supervises LUCAS, and the officer has advised that he believes the person depicted in the surveillance video is LUCAS.

7. I have reviewed records that summarize the defendant SHARIF LUCAS's prior criminal convictions. On or about August 4, 2021, the defendant was convicted in the U.S. District Court for the Eastern District of New York of being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1), and of possession of marijuana with intent to distribute, in violation of 21 U.S.C. § 841(b)(1)(D). See Docket No. 19-CR-467 (MKB). Based on my review of materials filed in LUCAS's prior federal case, I know that his conviction arose from his possession of a loaded firearm and marijuana during the 2019 J'Ouvert parade in Brooklyn, during which incident LUCAS attempted to flee from the police (as also captured on surveillance video). LUCAS is presently on federal supervised release in the Eastern District of New York. Further, on or about December 17, 2008, in Kings County Supreme Court, LUCAS was convicted of Robbery in the Third Degree, in violation of New York Penal Law § 160.05. All of the foregoing offenses are felonies punishable by more than one year of imprisonment.

8. Because the defendant SHARIF LUCAS is currently at liberty, it is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and arrest warrant, as disclosure would give LUCAS an opportunity to destroy evidence, change

patterns of behavior, notify confederates and flee from or evade prosecution and therefore would have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued so that the defendant SHARIF LUCAS may be dealt with according to law.

/s/ Max Dougal

MAX DOUGAL

Special Agent, Federal Bureau of Investigation

Sworn to before me by telephone this  
12 th day of June, 2022 at 11:06 a.m.

/s/ Roanne L. Mann

THE HONORABLE ROANNE L. MANN  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK